

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT PALMER

DAVID HAMMOND,

Plaintiff,

v.

THE HOME DEPOT #1304,

Defendant.

RECEIVED in the Trial Courts  
State of Alaska Third District  
at Palmer

DEC 20 2019

Clerk of the Trial Courts  
By \_\_\_\_\_ Deputy

Case No.: 3PA-18-\_\_\_\_\_ CI

COMPLAINT

COMES NOW Plaintiff, DAVID HAMMOND, by and through his attorneys, Pentlarge Law Group, LLC and for his Complaint against the Defendant, states and alleges as follows:

1. Plaintiff is a resident of the state of Alaska and has been at all times pertinent hereto.
2. Upon information and belief, Defendant is a duly licensed corporation doing business within the State of Alaska and is the owner of property located at 1255 E. Palmer/Wasilla Hwy., Wasilla, Alaska.
3. On or about January 8, 2017, after shopping in Home Depot, Plaintiff slipped and fell on the ice in the parking lot. Plaintiff fell and suffered pelvic fractures, meniscus tear of right posterior and straining his right side as he hit the ground.
4. Defendant had a duty to properly maintain and to keep said parking lot of the store free of ice hazards. Defendant breached that duty by failing to properly maintain and/or remove hazardous ice from the parking lot where patrons walk.

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5. Defendant had a duty to warn patrons of the unsafe conditions and/or hazardous conditions which could reasonably cause injury. The Defendant breached that duty by failing to warn Plaintiff of the dangerous condition.

6. Defendant's failure to properly maintain the parking lot to the store and failure to warn of dangerous conditions constitutes negligence on the part of the Defendant.

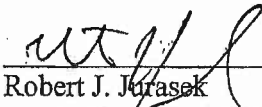
7. As a result of Defendant's negligence, Plaintiff has suffered damages including, but not limited to, medical expense, pain and suffering, loss of enjoyment of life and other damages all in an amount in excess of \$100,000.00, to be proven at trial.

WHEREFORE, having stated his Complaint, Plaintiff prays for judgment against the Defendant as follows:

1. For general and special damages for Plaintiff in an amount in excess of \$100,000.00, the exact amount to be proven at trial;
2. For pre-judgment and post-judgment interest at the maximum rate allowable by law;
3. For Plaintiff's costs and attorney's fees incurred in pursuing this action; and
4. For such other and further relief as the Court may deem just and equitable in the premises.

DATED this 20 day of December, 2018 at Anchorage, Alaska.

PENTLARGE LAW GROUP, LLC  
Attorneys for Plaintiff

  
Robert J. Jurasek  
Alaska Bar No.: 9111071

COMPLAINT  
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